### EXHIBIT A

**Proposed Order** 

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

	Ref. No
Debtors.	(Jointly Administered)
FTX TRADING LTD., et al., 1	Case No. 22-11068 (JTD)
In re:	Chapter 11

# ORDER SUSTAINING FTX RECOVERY TRUST'S ONE HUNDRED FIFTY-SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN NO LIABILITY PROOFS OF CLAIM (CUSTOMER CLAIMS)

Upon the one hundred fifty-seventh omnibus objection (the "Objection")<sup>2</sup> of the FTX Recovery Trust<sup>3</sup>, for entry of an order (this "Order") sustaining the Objection and disallowing and expunging in their entirety the No Liability Claims set forth in Schedule 1 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX.

<sup>&</sup>lt;sup>2</sup> Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors' (as defined below) confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the FTX Recovery Trust; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

#### IT IS HEREBY ORDERED THAT:

- 1. The Objection is SUSTAINED as set forth herein.
- 2. Each No Liability Claim set forth in <u>Schedule 1</u> attached hereto is disallowed and expunged in its entirety.
- 3. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any No Liability Claim referenced or identified in the Objection that is not listed on Schedule 1 attached hereto.
- 4. Should one or more of the grounds of objection stated in the Objection be dismissed, the FTX Recovery Trust's right to object on any other grounds that the FTX Recovery Trust discovers are preserved.

- 5. To the extent a response is filed regarding any No Liability Claim, each such No Liability Claim, and the Objection as it pertains to such No Liability Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each No Liability Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.
- 6. The FTX Recovery Trust is authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.
- 7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the FTX Recovery Trust may have to enforce rights of setoff against the claimants.
- 8. Nothing in the Objection or this Order, nor any actions or payments made by the FTX Recovery Trust pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors or the FTX Recovery Trust under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the FTX Recovery Trust's or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority,

enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the FTX Recovery Trust; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

- 9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

Dated: \_\_\_\_\_\_\_ Wilmington, Delaware The Honorable John T. Dorsey
Chief United States Bankruptcy Judge

### SCHEDULE 1

No Liability Claims

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# FTX Trading Ltd. 22-11068 (JTD) One Hundred Fifty-Seventh Omnibus Claims Objection Schedule 1 - No Liability Claims

		Asserted Claims			
Claim					
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Name on file	Recovery Trust has not identified any liabi FTX Trading Ltd.	inty owing to, or customer entitlement t	or, the claimant.	Undetermined <sup>3</sup>	
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3567 Name on file	K Recovery Trust has not identified any liabi FTX Trading Ltd.	SOL	or, the claimant.	50.00000000000000	
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Name on file	FTX Trading Ltd.	ETH		28.90230000000000	
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5928 Name on file	FTX Trading Ltd.	FTT		144,436.093278996846539	
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7620 Name on file	FTX Trading Ltd.	BTC		Undetermined*	
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7624 Name on file	FTX Trading Ltd.			Undetermined <sup>®</sup>	
		Other Activity Asserted	d: 32,300 - BTC		
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**Asserted Claims** Claim Number Name Debtor Tickers **Ticker Quantity** Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant. West Realm Shires Services Inc. Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant. Undetermined\* FTX Trading Ltd. Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. 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**Asserted Claims** Claim Number Name Debtor Tickers **Ticker Quantity** Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant. FTX EU Ltd. Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant. 15 000 0000000000000000 FTX Trading Ltd. LISD Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. 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Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.

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Name on file Quoine Pte Ltd BRL 500.00000000  eason: The Claimant did not provide proper documentation to support the asserted customer entitlement of, the claimant.  8478 Name on file FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  8478 Name on file FTX Trading Ltd. Undet  eason: The Claimant did not provide proper documentation to support the asserted customer entitlement of, the claimant.  8478 Name on file FTX Trading Ltd. Undet  eason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust revious ooks and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  8880 Name on file FTX Trading Ltd. Undet  eason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust revious and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  8888 Name on file FTX Trading Ltd. Undet  eason: The Claimant did not provide proper documentation to support the asserted customer entitlement of, the claimant.  8888 Name on file FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  8888 Name on file FTX Trading Ltd. Undet  8889 Name on file FTX Trading Ltd. LUNA2  3.76600000	eason: The C	Claimant did not provide	proper documentation to support the ass	erted customer entitlement claim. Utilizing the information provided wit	hin the claim form and following a robust review of the
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Name on file  FTX Trading Ltd.  Undet  deason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review ooks and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  BOBO Name on file  FTX Trading Ltd.  Undet  deason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review ooks and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  BA48 Name on file  FTX Trading Ltd.  Undet  deason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review ooks and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  BA48 Name on file  FTX Trading Ltd.  LUNA2  3.76600000		•		-	hin the claim form and following a robust review of t
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Name on file  FTX Trading Ltd.  Undet  Cooks and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  Cooks and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  Cooks and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  Cooks and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement claim. Utilizing the information provided within the claim form and following a robust review ooks and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  Cooks and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  Cooks and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  Cooks and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  Cooks and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.		·			hin the claim form and following a robust review of t
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Name on file FTX Trading Ltd. Undet deason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust revieworks and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  18392 Name on file FTX Trading Ltd. LUNA2 3.76600000		·		· · · · · · · · · · · · · ·	hin the claim form and following a robust review of t
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust revieworks and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  8392 Name on file FTX Trading Ltd. LUNA2 3.76600000				to, or customer entitlement of, the claimant.	Undetermine
pooks and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.  18392 Name on file FTX Trading Ltd. LUNA2 3.76600000			-	erted customer entitlement claim. Utilizing the information provided witi	
· · · · · · · · · · · · · · · · ·	ooks and rec	cords, the FTX Recovery 1	rust has not identified any liability owing	to, or customer entitlement of, the claimant.	-
LUNC 820,189.0000000	18392 Na	ime on file	FIX Irading Ltd.		820,189.000000000000

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.

820,189.0000000000000000

16,695,270.81000000000000 7,672.750000000000000

SHIB

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			Asserted Claims	
Claim Iumber	Name	Debtor	Tickers	Ticker Quantity
	Name on file	FTX Trading Ltd.	USD	Ticker Quantity 3,500.0000000000000000000000000000000000
eason: Th	ne Claimant did not provide p	_	serted customer entitlement claim. Utilizing the information provided with	nin the claim form and following a robust review of the
	records, the FTX Recovery Tr Name on file	ust has not identified any liability owing FTX Trading Ltd.	g to, or customer entitlement of, the claimant.  AAVE	100.00000000000000
,557	Name on me	TTX Trading Etd.	AVAX	100.00000000000000000000000000000000000
			BTC	0.25000000000000
			CUSDT	100.00000000000000000000000000000000000
			ETH	3.0000000000000000000000000000000000000
			LINK	250.00000000000000
			USD	1,200.0000000000000000000000000000000000
			YFI	1.0000000000000000000000000000000000000
			serted customer entitlement claim. Utilizing the information provided with g to, or customer entitlement of, the claimant.	nin the claim form and following a robust review of th
7409	Name on file	FTX Trading Ltd.		Undetermined
			serted customer entitlement claim. Utilizing the information provided with g to, or customer entitlement of, the claimant.	nin the claim form and following a robust review of the
	Name on file	FTX Trading Ltd.	5 - 7	Undetermined
			serted customer entitlement claim. Utilizing the information provided with a to, or customer entitlement of, the claimant.	nin the claim form and following a robust review of the
8306	Name on file	FTX Trading Ltd.		Undetermined
		•	serted customer entitlement claim. Utilizing the information provided with a to, or customer entitlement of, the claimant.	nin the claim form and following a robust review of the
	Name on file	FTX Trading Ltd.		Undetermined
			serted customer entitlement claim. Utilizing the information provided with g to, or customer entitlement of, the claimant.	nin the claim form and following a robust review of the
	Name on file	FTX Trading Ltd.		Undetermined
			Other Activity Asserted: 2630205.95USDT - I received a message o	n my WhatsApp with a screenshot attached
			serted customer entitlement claim. Utilizing the information provided with g to, or customer entitlement of, the claimant.	nin the claim form and following a robust review of the
	Name on file	FTX Trading Ltd.	gro, or customer entitlement of, the claimant.	Undetermined
	·		serted customer entitlement claim. Utilizing the information provided with to, or customer entitlement of, the claimant.	nin the claim form and following a robust review of the
	Name on file	FTX Trading Ltd.	5 - 7	Undetermined
		•	serted customer entitlement claim. Utilizing the information provided with g to, or customer entitlement of, the claimant.	nin the claim form and following a robust review of the
	Name on file	FTX Trading Ltd.		Undetermined
		•	serted customer entitlement claim. Utilizing the information provided with g to, or customer entitlement of, the claimant.	nin the claim form and following a robust review of the
8365	Name on file	FTX Trading Ltd.		Undetermined
			serted customer entitlement claim. Utilizing the information provided with g to, or customer entitlement of, the claimant.	nin the claim form and following a robust review of the
7433	Name on file	FTX Trading Ltd.	USDT	14,999.9900000000000000000000000000000000
		•	serted customer entitlement claim. Utilizing the information provided with a to, or customer entitlement of, the claimant.	nin the claim form and following a robust review of the
	Name on file	FTX Trading Ltd.	USD	500,000.0000000000000000000000000000000
			serted customer entitlement claim. Utilizing the information provided with g to, or customer entitlement of, the claimant.	nin the claim form and following a robust review of the
	Name on file	FTX Trading Ltd.	5 - 7	Undetermined
			Other Activity Asserted: \$673,275.20 - yes its with xclaim	
	·		serted customer entitlement claim. Utilizing the information provided with g to, or customer entitlement of, the claimant.	nin the claim form and following a robust review of the
8314	Name on file	FTX Trading Ltd.		Undetermined
	·		serted customer entitlement claim. Utilizing the information provided with g to, or customer entitlement of, the claimant.	nin the claim form and following a robust review of the
	Name on file	FTX Trading Ltd.	·	Undetermined
	·		serted customer entitlement claim. Utilizing the information provided with g to, or customer entitlement of, the claimant.	nin the claim form and following a robust review of the
	Name on file	FTX Trading Ltd.	· · · · · · · · · · · · · · · · · · ·	Undetermined
8317				

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.

### Case 22-11068-JTD Doc 29730-2 Filed 02/25/25 Page 12 of 12

			Asserted Claims			
Claim						
Numbe	r Name	Debtor		Tickers	Ticker Quantity	
98017	Name on file	FTX Trading Ltd.	BULL		1.3100000000000	
			ETHBULL		14.1300000000000	
	·			-	thin the claim form and following a robust review of the	
		Trust has not identified any liability owi	BTC	r, the claimant.	1.88331000000000	
8651	Name on file	FTX EU Ltd.	DOGE		100.00000000000000000000000000000000000	
			ETH		4,938.000000000000000000000000000000000000	
					•	
			LTC XVG		4,183.000000000000000000000000000000000000	
	·			- ·	thin the claim form and following a robust review of th	
		Trust has not identified any liability owi	ing to, or customer entitlement o	, the claimant.	Undetermined	
98579	Name on file	FTX Trading Ltd.			Ondetermined	
	·	proper documentation to support the a		-	thin the claim form and following a robust review of the	
98552	Name on file	FTX Trading Ltd.	BTC	, the claimant.	8.0000000000000	
0000	Name on me	FIX ITAUIIII LLU.	bic		0.00000000000	
	·	Trust has not identified any liability owi		- ·	thin the claim form and following a robust review of the 10.00000000000000000000000000000000000	
0020	Name on me		DOGE		30,000.000000000000000	
Reason:	The Claimant did not provide	proper documentation to support the	asserted customer entitlement cl	aim. Utilizing the information provided wit	thin the claim form and following a robust review of the	
ooks ar	nd records, the FTX Recovery	Trust has not identified any liability owi	ing to, or customer entitlement o	f, the claimant.		
96963	Name on file	FTX Trading Ltd.	USD		467,037.00000000000000	
Reason:	The Claimant did not provide	proper documentation to support the	asserted customer entitlement cl	aim. Utilizing the information provided wi	thin the claim form and following a robust review of the	
ooks ar	nd records, the FTX Recovery	Trust has not identified any liability owi	ing to, or customer entitlement o	f, the claimant.		
98743	Name on file	FTX Trading Ltd.	LTC		200.00000000000000	
			USD		180.00000000000000	
	•	proper documentation to support the a			thin the claim form and following a robust review of th	
7685	Name on file	FTX Trading Ltd.	DOT	,	80.000000000000000000000000000000000000	
. 505	ae on me	. IX IIdding Etd.	KSM		5.00000000000000	
			LUNA2		100.00000000000000000000000000000000000	
			SHIB		40,000,000.0000000000000000000000000000	
			SOL		5.0000000000000	
			USDT		500.00000000000000000000000000000000000	
			XLM		3,000.000000000000000000000000000000000	
			XRP		5,000.0000000000000	

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.